

THE HONORABLE JAMES L. ROBART

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JOHNNY B. DELASHAW, JR., M.D.,

Plaintiff,

v.

ALDEN ROBERTS, M.D.; MELANIE DELEON; MICAH MATTHEWS; GORDON WRIGHT; AND STEPHEN CORREA, D.V.M., each in their individual capacities,

Defendants.

NO. 2:18-cv-01850-JLR

**STIPULATED MOTION TO EXTEND
DISCOVERY DEADLINE ~~WITH~~ AND
[PROPOSED] ORDER**

NOTE FOR HEARING: 01/27/2020

BY STIPULATION AND AGREEMENT, the Plaintiff and the Defendants, by and through their respective counsel of record, request the Court grant the following relief:

1. Extend the discovery completion date from January 27, 2020, the date established by the Court's Minute Order Setting Trial Dates and Related Dates (Minute Order 03/04/2019 (Dkt. #12), to February 28, 2020, solely as to the depositions identified below.

2. The requested extension will allow the parties to complete expert witness depositions that have been properly noted prior to the discovery completion date but which cannot be completed by the current deadline as a result of scheduling issues, specifically the depositions of Plaintiff's experts Dr. Christopher Shaffrey, M.D., on February 17, 2020, in North Carolina, and

1 Ms. Ellen Politi, on February 18, 2020, in Virginia; and Defendants' experts Dr. Kent Neff, M.D.,
2 on February 10, 2020, in Oregon, and Ms. Lora Roberts, on February 4, 2020, in Missouri.

3 3. The parties do not believe the requested extension will interfere with any of the other
4 dates established by the Court's Minute Order of March 4, 2019.

5 SIGNED AND STIPULATED TO THIS 27th day of January, 2020.

6 BENNETT BIGELOW & LEEDOM, P.S.

ROBERT W. FERGUSON
7 Attorney General

8 s/ Michael Madden

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s/ Scott M. Barbara

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[PROPOSED] ORDER

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IT IS SO ORDERED.

Dated this 28th day of January, 2020.

JAMES L. ROBART
United States District Judge

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DECLARATION OF SERVICE

I hereby declare that on this 27th day of January, 2020, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will also send notification of such filing to the following parties:

Michael Madden – mmadden@bbllaw.com
Amy M. Magnano – amagnano@bbllaw.com

I declare under penalty of perjury that the foregoing is true and correct.

s/ Audrey Bell
AUDREY BELL
audrey.bell@atg.wa.gov